

Exhibit Q

VOL. I
PAGES 1-124
EXHIBITS 1-20

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

* * * * *

STEPHEN KEEFE,
PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION,
AFL-CIO, ET. AL,
DEFENDANTS.

* * * * *

DEPOSITION OF STEPHEN KEEFE, taken on
behalf of the Defendants, pursuant to the
applicable provisions of the Federal Rules of
Civil Procedure, before Bernadette J. D'Alelio,
Notary Public and Court Reporter within and for
the Commonwealth of Massachusetts, at the
Offices of Mullen & McGourty, 52 Temple Place,
Boston, Massachusetts, on May 8, 2006,
at 10:01 a.m., as follows:

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1 is that right?

2 A. No, I was not.

3 MR. LATHROP: I will object to
4 the form of the question. We will stipulate
5 that your interpretation is not correct. That
6 the "continues" didn't mean continues through
7 January of '06; it meant continuing past
8 February of '03.

9 You've elicited everything else in
10 terms of when it ended.

11 BY MR. MAHONEY:

12 Q. If the statement said Keefe continued
13 through 2003 to receive income from John
14 T. Clark, that would be a correct statement?

15 A. 2003?

16 Q. Yeah. Right here.

17 A. Yes. Not for the whole year.

18 Q. I understand. Were you laid off from
19 Clark in 2003?

20 A. No. I just stopped working for them.

21 Q. Why did you do that?

22 A. So I could get into the union and get
23 straight with them.

24 Q. Back into Gang -- was it 10?

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1 A. 11.

2 Q. We will talk in more detail about your
3 suspension in a little while. You were
4 suspended in 2003, in the spring of 2003; is
5 that right?

6 A. I don't even know what date it was.

7 Q. We can narrow that down later.

8 MR. MAHONEY: Let's mark the
9 complaint.

10 (Exhibit-4, Complaint, marked
11 for identification.)

12 BY MR. MAHONEY:

13 Q. Let me do a few more housekeeping
14 things. Have you ever had a conversation with
15 any member of the union about your suspension?

16 A. No.

17 Q. Have you ever had any conversation
18 with any member of the rules committee who were
19 on the rules committee in 2003 about your
20 suspension?

21 A. I don't even remember who was on the
22 rules committee in 2003.

23 Q. When I ask you that question, do you
24 understand that I'm asking you, not about

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1 anything that may have been said at a hearing,
2 but outside a hearing process?

3 Did you understand that when I was
4 asking you that question?

5 A. Yes.

6 Q. So with that understanding, have you
7 ever had any conversation with Mr. Sullivan
8 about your suspension?

9 A. No.

10 Q. Have you ever had any conversation
11 with Mr. Richard Flaherty about your
12 suspension?

13 A. No.

14 Q. Have you ever had any conversation
15 with Mr. Picard, Joseph Picard, about your
16 suspension?

17 A. No.

18 Q. That's a no?

19 A. No.

20 Q. What about Mr. Langin, have you ever
21 had a conversation with him about your
22 suspension?

23 A. No.

24 Q. What about Brendon Lee, did you ever

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1 have a conversation with him about your
2 suspension in 2003?

3 A. About any suspension, no.

4 Q. When is the last time you spoke with
5 Mr. Lee?

6 A. Two or three months ago maybe.

7 Q. What did you talk to him about?

8 A. He talked to me.

9 Q. He called you?

10 A. He talked to me. I didn't approach
11 him; he approached me.

12 Q. You saw him in person?

13 A. Yes.

14 Q. Where was that?

15 A. Down at the pier.

16 Q. What did he say?

17 A. He asked me why he was getting
18 subpoenaed.

19 Q. And what did you say?

20 A. I said, "You will have to talk to your
21 lawyer."

22 Q. Was that it?

23 A. He then asked me or told me his wife
24 was getting upset about this ordeal. And I

9 (Pages 30 to 33)

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